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Harris, On Target Indoor Shooting Range, LLC, Gaalswyk Enterprises, Inc.
(D/B/A/ Smokin’ Barrel Firearms), Gun Owners of California, Inc., Gun Owners of
7 America, Inc., Gun Owners Foundation, and California Rifle & Pistol Association,
Incorporated
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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 ADAM RICHARDS, an individual;
JEFFREY VANDERMEULEN, an
16 individual; GERALD CLARK, an
individual; JESSE HARRIS, an
17 individual; ON TARGET INDOOR
SHOOTING RANGE, LLC;
18 GAALSWYK ENTERPRISES, INC.
(D/B/A/ SMOKIN’ BARREL
19 FIREARMS); GUN OWNERS OF
CALIFORNIA, INC.; GUN OWNERS
20 OF AMERICA, INC.; GUN OWNERS
FOUNDATION; CALIFORNIA RIFLE
21 & PISTOL ASSOCIATION,
INCORPORATED; and SECOND
22 AMENDMENT FOUNDATION, a
California Corporation,

23 Plaintiffs,

24 v.

25 GAVIN NEWSOM, in his official
26 capacity as Governor of the State of
California; ROBERT BONTA, in his
27 official capacity as Attorney General of
the State of California, and DOES 1-10,
28

Defendants.

Case No.:

**DECLARATION OF ADAM
RICHARDS IN SUPPORT OF
PLAINTIFFS’ COMPLAINT FOR
DECLARATORY AND INJUNCTIVE
RELIEF**

DECLARATION OF ADAM RICHARDS

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2 1. I, Adam Richards, am a plaintiff in the above-entitled action. I make
3 this declaration of my own personal knowledge and if called as a witness, I could
4 and would testify competently to the truth of the matters set forth herein.

5 2. I am a current resident of El Dorado County, California.

6 3. I am a home-based FFL and an attorney. I work out of my home doing
7 legal work approximately 50% of the time.

8 4. In my home office, I conduct legal work and operate my FFL business.

9 5. I was forced to become a home-based FFL because the City of
10 Sacramento (where my law office is located) made the permitting process for
11 becoming an established commercial FFL so expensive that I could not afford to
12 have the FFL license in the same place as my main law office. Rather than waste
13 money on permitting with the city, I decided to open my FFL business in my home.

14 6. I have a separate structure at my home, which houses my home office.

15 7. The work I do for my legal practice includes telephone calls with
16 clients, opposing counsel, law enforcement, and others. These are often attorney-
17 client privileged conversations, and they are always private and not intended for
18 others to hear.

19 8. While working on legal matters in my home office, I may also have
20 confidential client files open and controlled documents such as criminal histories
21 provided in discovery, spread out that could be picked up on a recording device that
22 would be located in that space. This would be a breach of client confidentiality.

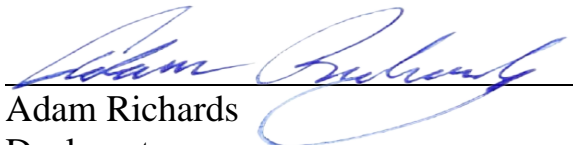
23 9. I also have a family with younger children. Many times, my children
24 will come to see me in the home office before school or before bed in the evenings.
25 As younger children, they can sometimes be partially dressed when they visit. I
26 could not imagine exposing my children in their most intimate times with a parent
27 to government recording.

28 10. Should AB 1384 be implemented, I will be forced to either

1 include highly intrusive recording devices into my home and home office, alert all
2 of my clients, family, friends, neighbors, etc., that they are being recorded, and
3 then hope that I do not get sued for recording someone without consent.

4 11. If this court were to enjoin SB 1384 enforcement, I would resume my
5 activities along with other gun owners and FFLs who conduct lawful and highly
6 regulated businesses.

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8 I declare under penalty of perjury that the foregoing is true and correct.
9 Executed within the United States on December 19, 2023.

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13 Adam Richards
14 Declarant

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